



El Toro Water District

August 18, 2005

Department of Water Resources

Attention: Ms. Tracey Billington

Subject: South Orange County Integrated Regional Water Management Plan

Dear Ms. Billington:

As a member of the South Orange County IRWMP and specific Regional Recycled Water Treatment and Distribution proponent within the proposal, we support the detailed comments of the lead agency of our group, the County of Orange. These comments are more global than specific. The overall concerns that the El Toro Water District has are as follows:

- **DATA DUPLICATION:** The basic descriptive information was provided under the Step 1 PSP. Attachments 1 and 2 are duplicating the information already provided. We recommend deleting the duplication of information to save unnecessary costs for local entities in completing Step 2 .
- **EXCESSIVE VOLUMES OF DATA AND INFORMATION REQUIREMENTS:** This is a grant program with the purpose of assisting local entities that are in need of funds to implement water supply and water quality projects that benefit the region for the next 20 plus years. The onerous task of preparing all the necessary project information without the funding to do so appears contradictory to the programs intent. The required data being requested for each of the projects and entities under Step 2 is overwhelming and unprecedented.
- **ECONOMIC ANALYSIS:** The economic analysis is very onerous because each project included in the suite of proposed projects must be rolled into one economic analysis, which will prove challenging since each project is likely at a different stage in development. For water recycling projects, we recommend the more simplified evaluations of avoided future costs use approaches often used by the SWRCB Revolving Loan Program.

We encourage you to carefully consider the detailed comments of the lead agency for the South Orange County IRWMP, the County of Orange. We look forward to a more streamlined process that saves unnecessary costs to the local project proponents, the communities that we serve and the state while meeting the intent of Prop 50 Chapter 8.

Thank you for the opportunity to comment.

Respectfully Submitted,

El Toro Water District



Robert R. Hill
General Manager